

Urban Design Comments	
<b>Application reference</b>	22/129789
<b>Site Address</b>	21- 57 WILLOW WAY (Site A)
<b>Proposal</b>	Demolition of existing buildings and redevelopment of the site comprising a block rising to 5/6 storeys accommodating 1,401sqm of employment floorspace (Use Classes E(g)(i)(ii)(iii)) at ground and mezzanine floors and 60 residential units (Use Class C3) above, with associated landscaping, amenity areas, cycle, car parking and refuse/recycling stores at 21- 57 Willow Way, London, SE26
<b>Officer</b>	Beth Stevens
<b>Date</b>	20/02/2023

Comments:

### Overall Summary

The proposal is not considered by urban design officers to meet the high-quality design standards set out in Lewisham's Core Strategy; Lewisham's emerging local plan; The London Plan; and The National Design Guide. As such it will not be supported for approval.

### Context

- No convincing baseline analysis underpins the proposal, although site photographs and some high-level mapping of the existing buildings on and immediately adjacent to the site have been provided. Officers acknowledge that the current buildings are poor quality and haphazardly arranged, including several temporary storage units, however a comprehensive baseline analysis should be undertaken of the local context in accordance with London Plan Policy D3 – Optimising Site Capacity through the design-led approach.
- The relationship to William Wood House is considered to be poor. While improvements to the existing boundary treatments have been suggested (reduction in height of the boundary retaining wall, mesh fences with planters, view to courtyard – although this would be obscured by the climbing plants), the height and mass of the proposal would have an overbearing impact on the care home.
- Townscape views have been mapped but not provided, so impact on the adjacent CA and NDHA cannot be assessed (refer conservation officer comment)

*Officer summary: It has not been adequately shown how the proposal will enhance its surroundings as the applicant has not demonstrated an understanding or evaluation of the unique characteristics of the site*

### Identity

- The DAS provides some reference to local material palettes/'local character' (page 23) and architectural styles (page 11) within the context, but does not assign value to these, aside

from indicating that the existing industrial-use buildings on Parcel A have no architectural merit.

- The proposal introduces a step-change in scale from the immediate context, which gives the site a unique identity within the local area. This approach could be accepted if the proposal unlocks the potential of the site as identified in the emerging site allocation, and the impact on the neighbouring properties can be shown to be mitigated. Officers assess that this is not the case, as the scale of the development has an overbearing relationship to William Wood Care Home and no internal arrangements and function of the rooms that will be impacted has been shown.
- The proposal makes use of contemporary forms with high quality robust materials which would be supported when paired with an architectural language that is coherent with the function of the site.

*Officer summary: The proposed architectural articulation is not informed by the local context, nor does it set itself apart from it in a meaningful way (i.e.: it is not assessed to be distinctive). The residential character of the upper floors appears to have informed the architecture of the ground floor, whereas the requirement for the development to be employment-led would have this relationship reversed, with a stronger ground floor identity that anchors the scheme to the public realm. While the proposal is not offensive in terms of the architectural articulation, it does not provide adequate interest for its scale. It is not supported.*

### **Built form**

- The emerging masterplan does not appear to be balanced in terms of provision of uses across the site allocation. A more refined, context-led layout might see a shift in residential density away from Parcel A towards the rear or centre of the site.
- Design development has not been shown and the emerging masterplan has not been through a rigorous testing process. As such officers are not convinced that this is the optimum solution for the site.
- A reduction in units, alongside an exercise in maximising plan efficiency could provide the opportunity to introduce architectural articulation through openings between the front and back of the site, reinstating a relationship with the Sydenham CA.
- A stepped building line could be supported where the blocks have reduced height, but these could be further emphasized to add depth and visual interest to the primary facade
- The public/private edge where the building meets the ground has not been well mediated, with loading bays obscuring views to the residential core entrances when approached from Kirkdale.
- No buffer zone/softening has been provided between the pavement and the hard edge of the building. More separation between the building and the road would be preferred

*Officer summary: The proposed building form for Parcel A is assessed to lack coherence, with poor balance between solid/void, public/private, and commercial/residential use. The root of this issue is assumed to be the quantum of residential units proposed on this parcel of land. The built form, in terms of scale, mass and bulk, would not be supported in its current form.*

### **Movement**

- The emerging masterplan proposes improving connectivity of the site by reinstating a pedestrian path off Dartmouth Road; and widening Willow Way as well as making it into a

one-way for vehicular movement. The viability of this has not been shown. The mews street is also proposed to be widened, but no vehicular connection through to Willow Way is proposed. In design terms this approach could be supported, subject to comments from Transport and Highways.

- For the employment floorspace workshop/studio space and small industrial units are proposed. On land parcel A the units are intended to be for light industrial use, which requires neither yard nor customer parking (as per GLA guidance on co-location). However, submitted visuals show lorries parked within the workshop spaces. The 6m height also indicates that the design intention is for more industrial type activities, rather than office/storage space.
- Two loading bays are provided to service all the proposed workshop spaces as well as the residential units
- Vehicles currently use the pavements along Willow Way and the mews street to park. No mention has been made of where these displaced vehicles will go
- Level access along the ground floor is supported

*Officer summary: The proposal fails to address where displaced vehicles will park, how vehicular access to the workshops and studios will work, and how the proposal will generally be serviced.*

*There is a potential for vehicles to dominate the public realm with the application as it stands, and as such it is not supported.*

## **Environment**

- A tree survey has been conducted. 5 small trees to the eastern/front façade are recommended for removal. Hand excavations are proposed for minimal root disturbance to the large Grade B trees on the north and south boundaries, which are also recommended to be heavily pruned back to allow for the development
- The scale of the development means that views of the tree canopy through Willow Way will be obscured, and trees to the front elevation of the proposal are to be removed. Street trees have not been incorporated into the design. This is not supported, and officers would require the trees removed on Willow Way to be re-provided to improve public realm and reinstate views of a tree canopy through the site
- The proposal includes a courtyard garden to the rear of the site, adjoining the William Wood care home. No clear function for this site has been established, except as a 'wildlife friendly, visually attractive space' with some parking and cycle storage. Given that the proposals do not provide supporting yard space for the industrial units which open out onto this space via roller shutters, officers are concerned that if the garden space could become an unplanned and untidy yard and storage area.
- The proposal for Site A includes 3 roof terraces which are one level lower than the residential units adjacent. They have a mix of play space, planting, and seating for quiet space. The north and south gardens are designated for 0-4 year old play; and the central garden is designated for 4-11 year old play. 12+ year old play is to be provided off-site. Provided that the planting to the edges of the terraces provides adequate screening for the privacy of adjacent neighbours, this approach is supported.
- Urban greening factor is met/exceeded

*Officer summary: The roof terraces appear to be visually attractive with high quality play spaces which would be supported. Additional softening could be achieved on the front façade of the*

buildings. The use of the courtyard space needs to be more clearly defined to avoid it becoming an eye sore.

### **Public Spaces**

- The emerging masterplan envisions public realm improvements to be offered in the form Willow Way becoming a one-way traffic system to give more space over to pedestrians, cyclists, loading and parking. However, this is heavily reliant on the development of parcel B and C, whose frontage is stepped back significantly. Whilst this is defined within the overall masterplan it does not form part of this planning application and would be reliant on third party land.
- Amenity spaces are mostly above ground (in emerging masterplan amenity space is provided on 1F podium level; in proposal amenity space is provided at 4<sup>th</sup> floor roof level and behind Willow Way façade on GF). There is no public access to these green spaces.
- Passive surveillance with the introduction of residential use will increase safety of the street at night, which would be an improvement that would be supported
- No provision for public furniture, pause spaces or street trees has been made on Parcel A

*Officer summary: Public Realm improvements rely solely on Parcel B+C being developed. The proposed development on Parcel A should be reconfigured to introduce an element of public realm within the proposal; or the development of Parcel A, B, and C should be assessed holistically through a combined application.*

### **Uses**

- The applicant has shown how the commercial spaces can be adapted over time with simple floor plates and the ability to customise mezzanine space. This strategy is supported, subject to the units being shown to be fit for purpose in terms of servicing and access.
- The residential component has a tenure split of 50% affordable homes which is supported
- The access to the upper floors, which contain residential units, are via two cores, each containing two lifts and a stair.
- 8 apartments lead off each core on each floor via a long corridor. No separate fire protected lobby is proposed, which does not meet current building regulations.
- The north and south roof gardens (both containing 0-4 year old play) are to have limited access. This may create a barrier to integration, as the north garden would service the market housing while the south garden would service the social housing. An improved access strategy for the shared amenity spaces should be achieved to avoid segregation of tenures

*Officer summary: A reduction in residential units on Parcel A may create opportunities for better residential access cores on the ground floor and an improved user journey to their front door. As it stands, the communal spaces for residential users are not considered to be integrated sufficiently to be supported.*

### **Homes and buildings**

- The applicant has proposed a 50:50 split between affordable (south block) and market (north block) homes. A significant amount of these units are studios and one bedrooms (40%)

Market: 3xstudio; 7x1b2p; 17x2b4p; 3x3b6p

Affordable: 1xstudio; 13x1b2p; 1x2b3p; 7x2b4p; 6x3b5p; 2x3b6p

- 40% of the units are single aspect
- Many of the flat layouts are inefficiently planned. A repeating issue appears to be the size and shape of (particularly) secondary bedrooms. Narrow rooms with wall-to-wall windows make internal storage in these bedrooms very difficult. Long corridors in the family units are also considered a problem in planning terms. These appear to be a result of the long, narrow planform on the south side of the site.
- External amenity spaces on the 4<sup>th</sup> floor (roof terrace) provide opportunities for comfort, relaxation, and stimulation - including play - for residents, which is in line with NDG and is supported. However, passive surveillance to these spaces could be improved through the placements of windows overlooking these areas, as well as a more generous communal lobby with clear sight lines through to the gardens
- Daylight/sunlight in some of the habitable rooms is below the acceptable threshold (in terms of BRE compliance). While it is accepted that compromise will be required in higher density development, a reduction in density should be tested to provide excellent sunlight and daylight to all units
- Bins and cycle storage is provided on the ground floor with access off Willow Way.

*Officer summary: the internal arrangements of the residential units are not considered to be optimal. Studio apartments will generally be resisted as they are not considered to provide a long-term, sustainable solution for meeting Lewisham's housing needs. Further refinement of the internal layouts, including a re-working of the internal shared circulation spaces, would be required for the proposal to gain support in design terms.*

## Resources

- The fabric first approach is supported, with improved insulation to meet the London Plan requirements
- ASHPs are supported to reduce the energy requirements of the scheme, but their location on the external amenity spaces of the residential units will be strongly resisted, unless it can be shown that they will be adequately screened from view, acoustically isolated, a clear maintenance strategy is provided, and it is proven that none of these requirements will reduce the area of the terraces to below what is acceptable in London Plan terms
- Cladding materials are robust and will require little maintenance. This is supported

*Officer summary: the proposal makes fair use of the site's natural resources and proposed energy reductions in line with London Plan requirements. It could be supported.*

## Lifespan:

- The commercial floor plans appear to present a reasonable amount of flexibility to be adapted over time
- The residential units could benefit from further plan rationalisation to maximise adaptability over time.

*Officer summary: on balance, the proposal could be assessed to meet the requirements of being built to last*

Relevant Policies:

National Planning Policy Framework 2021 National Design Guide (NDG) 2021 The London Plan 2021 (D6; P38) The London Housing SPG LB Lewisham Local Plan 2014 (DM25, DM30, DM32, DM33) LB Lewisham Core Strategy 2010
Recommendation:
<b>Refuse</b>
Potential revisions/amendments (if necessary):
DRP review, masterplan to be more rigorously tested together with Council, re-design once proposal can be truly plan-led